

**IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF ALABAMA  
SOUTHERN DIVISION**

**EVA WILLIAMS,  
PLAINTIFF,**

**v.**

**GREATER GEORGIA LIFE,  
INSURANCE COMPANY,  
DEFENDANT.**

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**CASE NO: 1:06-CV-387-CSC**

**DECLARATION OF EVA WILLIAMS**

I, Eva Williams, hereby declare and state as follows:

1. I am over the age of 21 and I have personal knowledge of the matters contained in this declaration.

2. I am the Plaintiff in the above styled action and at the time I filed my application for Short Term Disability ("STD") with Greater Georgia Life Insurance Company, ("GGL"). I was an employee of the West Point Homes, Inc. ("West Point") manufacturing facility in Abbeville Alabama.

3. Prior to July 22, 2004, I began having problems with pain in my hip that radiated down my leg. I was referred by my family physician Dr. Bendinger to Dr. James P. Dehaven with the Dothan Bone Joint and Specialist.

4. On my initial visit, Dr. Dehaven examined me and made a determination that I had severe degenerative arthritis to my hip. He discussed with me later, the options that I had other than surgery.

5. Later, because of severe pain, I decided to proceed with surgery and on December 14, 2004, I was admitted to Flowers Hospital where a total hip arthroplasty was performed by Doctor James P. Dehaven.

6. At that time, I was placed on STD under my policy with West Point which was administered by GGL.

7. From the date of the surgery, my physician, Dr. James P. Dehaven, treated me and saw me in his office on numerous occasions.



8. In June of 2005, I attempted to return to work with West Point; however, because of the pain from my hip and the wobbles in the hip I was unable to perform my job.

9. On August 9, 2005, I returned to Dr. Dehaven's office complaining of my problems and at that time he agreed with me that I was unable to work until my follow up visit in December of 2005 (see records of Dr. Dehaven 00055, 00016). Dr. Dehaven gave me an excuse from work for that period on that day.

10. I did call Dr. Dehaven's office to get them to give me records for my disability after the visit on August 9, 2005.

11. I saw Dr. Dehaven again on September 21, 2005 with pain and then on December 9, 2005, I returned to see Dr. Dehaven. On that date, Dr. Dehaven returned me to work.

12. At no time did I tell anyone from GGL that I had not been treated by Dr. Dehaven at the time that he wrote the excuse for not being able to work.

13. Up until December of 2005, I was continuously treated and seen by Dr. Dehaven and he had given me a document stating that I could return to work.

I declare under penalty of perjury that the foregoing is true and correct.

Further declarant saith not.

Date: 12/11/06

Eva Williams

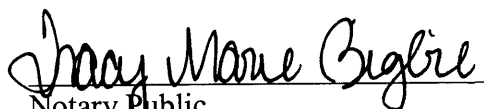
Eva Williams

STATE OF ALABAMA,  
COUNTY OF HOUSTON,

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Before me, the undersigned authority, personally appeared **Eva Williams**, who, being by me first duly sworn deposes and says that she has read the allegations of the foregoing petition and the same are true and correct to the best of her information, knowledge and belief.

*Sworn to and subscribed before me this 11th day of December, 2006.*



Notary Public

My Commission Expires **MY COMMISSION EXPIRES**  
**FEBRUARY 9, 2010**